

## Exhibit 59

Plaintiffs' Corrected Averment of Jurisdictional Facts and  
Evidence and/or Statement of Facts as to Defendant Al Rajhi Bank  
Pursuant to Rule 56.1



[Bilingual Text]



**AL RAJHI BANKING & INVESTMENT CORP.**

---

No. 633/SH.Q./2004

Date: 05/01/1425 AH – February 25, 2004 AD

His Eminence Sheikh Saleh bin Abdel Aziz bin Mohamed Al ash-Sheikh  
Minister of Islamic Affairs, Endowments, Da'wah, and Guidance  
General Supervisor of the Al-Haramain Islamic Foundation  
May the peace, mercy, and blessings of Allah be upon you.  
I ask Allah that you are doing well.

This is with reference to SAMA's circular No. 5082/M.A.T./55, dated 02/03/1423 AH (May 14, 2002 AD), mandating that it is not permissible to open any account for any charity entity before obtaining a permit from the Ministry of Islamic Affairs, Endowments, Da'wah, and Guidance or the Ministry of Labor and Social Affairs (a copy is enclosed herewith). This requirement is one of the documents for opening the charity accounts.

Since there is no permit from the competent agencies for the Al-Haramain Islamic Foundation to operate the charity work – according to the documents provided by the Al-Haramain Islamic Foundation to the company when opening its accounts – please authorize your competent agency to issue the required permit.

May Allah bless you.

[Handwritten Signature]

Abdullah bin Soliman al Rajhi  
Director General  
[Handwritten Signature]

*Alahoodi@alrajhibank.com.sa*

2004

Ali al Amoudi

[Bilingual Text]

Head Office: P.O. Box 28 Riyadh 11411 Kingdom of Saudi Arabia – Tel. 4601000 – Ext. 1440/1432 – Fax: 4601000 Ext. 1456

CONFIDENTIAL: This document is subject to a Protective Order regarding confidential information in 03 MDL 1570 (GBD) (SN), United States District Court for the Southern District of New York

ARB-00039945

[LOGO: SAMA]

General Directorate of Banking Control

Banking Inspection Division

[Bilingual Text]

provided that, the bank of such party must be in a country where KYC principles are fully implemented and complied with. The first payment to the account should be routed through an account maintained at the bank which issues the letter.

6. The account should be opened only for the purposes of food expenses, accommodation, transportation, guide, expenses, tawafa and living requirements. All these should be stipulated in the account opening agreement.
7. Account should operate for a period of seven months, from 1<sup>st</sup> Rajab to the end of Muharram or to the date fixed by the applicant not exceeding end of Muharram.
8. Account should be opened in the name of the foreign party if the account opening application is submitted by the expatriate licensee holding residence permit or a visa as a member of pilgrimage mission.
9. SAMA's approval for operating these accounts should be obtained after meeting all of the above requirements by the bank.
10. Such accounts must be subjected to dual control.

300-1-5-2

**Charitable and Welfare Organizations :**

Bank may open only Saudi Riyal accounts for charitable organizations and their branches such as Al Bir society the Quran Memorization Society and their branches and others religious and social organizations. A license from the Ministry of Labor and Social Affairs or the Ministry of Islamic Affairs and Call and Guidance for practicing the activity for which the account is required and a letter of authorization from the chairman of the society is to be provided. The bank must obtain SAMA's approval to open the account upon submitting the supporting documents. If the account is meant for raising donations and charities by means of information media or service channel, an additional approval must be obtained from the High Committee for Collecting Donations. However, if it is only for collecting charities and paying normal social welfare expenses, permission from SAMA will suffice. Such organizations are strictly prohibited from transferring funds outside the Kingdom. Charitable organizations licensed by the Ministry of Labor and Social Affairs may open account for investment of surplus amounts, in activities that may generate income to help them achieve their objectives after obtaining the approval of this Ministry. Banks should never allow any charitable society to participate or get involved in financial speculations.

AL RAJHI BANKING &amp; INVESTMENT CORP.



شركة الراجحي المصرفية للاستثمار

٢٠٠٤/٦/٣٣

٢٠٠٤/٢/٢٥ - ١٤٢٥/١/٥

حفظه الله

صاحب المعالي الشيخ / صالح بن عبدالعزيز بن محمد آل الشيخ  
وزير الشؤون الإسلامية والأوقاف والدعوة والإرشاد  
والمشرف العام على مؤسسة الحرمين الخيرية


السلام عليكم ورحمة الله وبركاته، وبعد:  
فأدعواكم بالعموم ودوام التوفيق

وأشير إلى تعميم مؤسسة النقد العربي السعودي ذي الرقم ٥٠٨٢/م أ ت/٥٥ والتاريخ ١٤٢٣/٣/٢ هـ القاضي بعدم جواز فتح أي حساب لأي جهة خيرية إلا بعد الحصول على ترخيص بذلك من وزارة الشؤون الإسلامية والأوقاف والدعوة والإرشاد أو وزارة العمل والشؤون الاجتماعية ( مرفق صورة ) وهذا الشرط هو أحد مسوغات فتح الحسابات الخيرية.

وبناء عليه وفي ظل عدم وجود ترخيص من الجهات المختصة لمؤسسة الحرمين الخيرية بمزاولة العمل الخيري - حسب المسوغات التي قدمتها المؤسسة للشركة عند فتح حساباتها - فإننا نرجوا من معاليكم تعميم جهة الاختصاص لديكم بإصدار الترخيص اللازم.

والله يحفظكم ويرعاكم،،،

بالتوقيع

  
عبدالله بن سليمان الراجحي  
المدير العام

عند الإصدار

٢٠٠٤

Alahoul@alrajhibank.com.sa

المركز الرئيسي : ص. ب. ٢٨ - الرياض ١١٤١١ - المملكة العربية السعودية - هاتف ٤٦٠١٠٠٠ - فاكس ٤٦٠١٠٠٠ - ج. ب. ١٤٣٢/١٤٤٠ - فاكس ٤٦٠١٠٠٠ - ج. ب. ١٤٣٢/١٤٤٠  
Head Office: P. O. Box 28 - Riyadh 11411, Kingdom of Saudi Arabia - Tel. 4601000 Ext. 1440/1432 - Fax. 4601000 Ext. 1456

إدارة التفيش البنكي



الإدارة العامة لمراقبة البنوك

provided that, the bank of such party must be in a country where KYC principles are fully implemented and complied with. The first payment to the account should be routed through an account maintained at the bank which issues the letter.

6. The account should be opened only for the purposes of food expenses, accommodation, transportation, guide, expenses, tawafa and living requirements. All these should be stipulated in the account opening agreement.

7. Account should operate for a period of seven months, from 1<sup>st</sup> Rajab to the end of Muharram or to the date fixed by the applicant not exceeding end of Muharram.

8. Account should be opened in the name of the foreign party if the account opening application is submitted by the expatriate licensee holding residence permit or a visa as a member of pilgrimage mission.

9. SAMA's approval for operating these accounts should be obtained after meeting all of the above requirements by the bank.

10. Such accounts must be subjected to dual control.

300-1-5-2

#### Charitable and Welfare Organizations :

Bank may open only Saudi Riyal accounts for charitable organizations and their branches such as Al Bir society the Quran Memorization Society and their branches and others religious and social organizations. A license from the Ministry of Labor and Social Affairs or the Ministry of Islamic Affairs and Call and Guidance for practicing the activity for which the account is required and a letter of authorization from the chairman of the society is to be provided. The bank must obtain SAMA's approval to open the account upon submitting the supporting documents. If the account is meant for raising donations and charities by means of information media or service channel, an additional approval must be obtained from the High Committee for Collecting Donations. However, if it is only for collecting charities and paying normal social welfare expenses, permission from SAMA will suffice. Such organizations are strictly prohibited from transferring funds outside the Kingdom. Charitable organizations licensed by the Ministry of Labor and Social Affairs may open account for investment of surplus amounts, in activities that may generate income to help them achieve their objectives after obtaining the approval of this Ministry. Banks should never allow any charitable society to participate or get involved in financial speculations.

الجبهة في نول تطبق وتلتزم بمبدأ اعرف عميلك وان تجري التفتة الأولى للحساب عبر حساب بنكي لدى البنك مقدم التزكية .

٦. يجب أن يفتح الحساب فقط لأغراض نفقات الطعام والإقامة والمواصلات والإدلاء والطرافة ومستلزمات المعيشة وإن بنص على ذلك في اتفاقية فتح الحساب .

٧. يفتح الحساب لمدة سبعة شهور من أول رجب إلى آخر محرم أو إلى نهاية التاريخ الذي حددته طالب فتح الحساب على أن لا يتجاوز آخر محرم .

٨. يجب أن يفتح الحساب باسم الجهة الخارجية إذا كان فتح الحساب مقدم من قبل الوافد صاحب الترخيص الذي يحمل إقامة أو تأشيرة بمهنة عضو بعثة حج .

٩. يجب الحصول على موافقة مؤسسة النقد لفتح هذه الحسابات بعد استكمال الشروط أعلاه من قبل البنك .

١٠. يجب أن تخضع هذه الحسابات للمراقبة الشائبة.

#### جميعات التفت العام الخيرية:

٢-٥-١-٣٠٠

للبنك أن يفتح حساباً بالريال السعودي فقط للجمعيات الخيرية وقسروها كجمعية البر وجمعية تحفيظ القرآن والجمعيات النسائية وغيرها من الجمعيات الدينية والاجتماعية عند تقديم ترخيص من وزارة العمل والشؤون الاجتماعية أو وزارة الشؤون الإسلامية والأوقاف والدعوة والإرشاد بمزاولة النشاط الخيري المطلوب فتح الحساب له وتوقيع من رئيس الجمعية. وعلى البنك أن يكتب إلى مؤسسة النقد للموافقة على ذلك، وأن يقدم المستندات المبررة المذكورة. وإذا كان الحساب لجمع للترعات والإحسان عبر وسائل الإعلام وقنوات الخدمات يجب الحصول على موافقة إضافية من اللجنة العليا لجمع التبرعات. أما إذا كانت لجمع الصنقة ونفع نفقات الشؤون الاجتماعية فتكون موافقة مؤسسة النقد كافية. ولا يسمح لهذه الجمعيات بتحويل الأموال إلى خارج المملكة بئناً. ويجوز للجمعيات الخيرية المرخصة من وزارة العمل والشؤون الاجتماعية فتح حسابات لاستثمار أموالها التي تزيد عن احتياجاتها في أنشطة يكون لها عائد مالي يساعد على تحقيق أهدافها بعد الحصول على موافقة تلك الوزارة مما عدا المضاربات المالية فإنه يحضر على البنوك السماح لأية جمعية خيرية الدخول فيها .



## TRANSLATION CERTIFICATION STATEMENT

**Project:** ARB 39945-39947

**Language:** Arabic > English

**Documents:**

ARB 39945

ARB 39946

ARB 39947

**TRANSLATOR STATEMENT**

I hereby declare that, to the best of my knowledge and belief, the translation of the above referenced documents is a true, accurate and complete translation of the original.

**Name of Certifying Translator:** Farah Alshekhli

**Qualifications:** BA in Translation and Interpretation Studies, 17 years of experience, certified in Medical Terminology

**Signed:** Farah Alshekhli

**Date:** 05/05/2023